

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et.al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Re: D.I. Nos. 760, 823, 847, 849, 859, 876, 930, 945,  
995, 1055. 1457 and \_\_\_\_

**ORDER PURSUANT TO LOCAL RULE 9006-1(d) GRANTING  
MOTION OF BURLINGTON STORES, INC. FOR LEAVE TO FILE LATE  
AMENDED OMNIBUS REPLY TO OBJECTIONS TO BURLINGTON'S  
ASSIGNMENT AND ASSUMPTION OF MYRTLE BEACH, SC, WASHINGTON, UT,  
BELLEVUE, NE, FLAGSTAFF, AZ, AND FAYETTEVILLE, AR LEASES**

Upon consideration of the *Motion of Burlington Stores, Inc. for Leave to File Late Amended Omnibus Reply to Objections to Burlington's Assignment and Assumption of Myrtle Beach, SC, Washington, UT, Bellevue, NE, Flagstaff, AZ, and Fayetteville, AR Leases* (the "Motion for Leave");<sup>2</sup> and the Court finding that: (i) it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) venue of these chapter 11 cases and the Motion for Leave are proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409; and (iv) after due deliberation, good and sufficient cause exists for the relief requested in the Motion for Leave. Accordingly, it is hereby

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion for Leave.

**ORDERED, ADJUDGED, AND DECREED that:**

1. The Motion for Leave is granted, as set forth herein.
2. Burlington is granted leave and permission, pursuant to Local Rule 9006-1(d), to file the Amended Reply, and the Amended Reply is deemed timely filed and a matter of record in these chapter 11 cases.
3. The Court shall retain jurisdiction over any and all matters arising from or related to the implementation or interpretation of this Order.